



U.S. Department of Justice

Andrew E. Lelling
United States Attorney
District of Massachusetts

Main Reception: (617) 748-3100

John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210

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U.S. DISTRICT COURT
DISTRICT OF MASS.

BY HAND

Honorable Indira Talwani
U.S. District Judge
U.S. District Court for the District of Massachusetts
John Joseph Moakley United States Courthouse
One Courthouse Way, Suite 2300
Boston, MA 02210

Re: *United States v. Abbott, et al.*, No. 19-cr-10117-IT

Dear Judge Talwani:

As indicated in Footnote 1 of the Government's Memorandum regarding Methodology for Calculating Gain or Loss under the Sentencing Guidelines, which was filed today in the above-referenced matter at Docket 420, enclosed please find an Appendix of documents cited therein.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric S. Rosen".

Eric S. Rosen
Assistant United States Attorney

APPENDIX
to the Government's Memorandum Regarding
the Methodology for Calculating Gain or Loss under the Sentencing Guidelines,
United States v. Abbott, et al., No. 19-cr-10117-IT

Tab	Document
1.	Winton, Richard, <i>Long before college admissions scandal, universities saw signs of fraud on campus</i> , L.A. TIMES (May 20, 2019), available at https://www.latimes.com/local/lanow/la-me-college-admissions-scandal-universities-what-know-explainer-20190520-story.html
2.	Georgetown University, Update on the U.S. Department of Justice Investigation (March 12, 2019), available at https://www.georgetown.edu/media-advisories/03122019b
3.	Rubin, Joel and Matthew Ormseth, <i>How many students cheated to get into USC? A look inside the admissions investigation</i> , L.A. TIMES (July 16, 2019), available at https://www.latimes.com/local/lanow/la-me-college-admissions-usc-20190716-story.html
4.	University of Southern California, Updates regarding college admissions investigation, available at https://news.usc.edu/155195/statement-regarding-college-admissions-investigation/ (last updated Aug. 12, 2019)
5.	University of Southern California, USC information on college admissions issue (Aug. 11, 2019), available at https://news.usc.edu/155225/usc-information-on-college-admissions-issue/
6.	E-Poll Market Research, <i>How Do Brands Survive a Crisis?</i> (May 13, 2019), available at https://blog.epollresearch.com/2019/05/13/how-do-brands-survive-a-crisis/
7.	Rooney, P., and Smith, J., <i>The Impact of Highly Publicized Campus Scandals on College Outcomes</i> , CONTEMPORARY ECONOMIC POLICY (Mar. 18, 2019), available at https://onlinelibrary.wiley.com/doi/full/10.1111/coep.12427
8.	Mackovich, Ron, <i>USC sees record number of applicants for fall 2018 admission</i> , USC NEWS (March 23, 2018), available at https://news.usc.edu/139338/usc-acceptance-rate-fall-2018-admission/
9.	USC Dornsife College of Letters, Arts and Sciences, Freshman Application Process, available at https://dornsife.usc.edu/undergraduate-application-process/ (last accessed Sept. 4, 2019)
10.	Kahn-Perry, Taylor, <i>Admissions Rate Falls to 14 Percent, Lowest in University History</i> , THE HOYA (April 5, 2019), available at https://www.thehoya.com/admit-rate-falls-14-percent-lowest-university-history/
11.	Georgetown University Office of Undergraduate Admissions, First Year Application, available at https://uadmissions.georgetown.edu/applying/first-year-application/ (last accessed Sep. 4, 2019)
12.	Calif. Bill No. ACR-64
13.	Press Release, Cal. State System, CSU New Students Applications and Admissions By Campus and Student Level (Dec. 14, 2018), available at https://www.calstate.edu/as/stat_reports/2018-2019/apps_f2018_all.htm ,

14. Press Release, UC System, Freshman Applications by Campus and Residency, *available at* https://www.ucop.edu/institutional-research-academic-planning/_files/factsheets/2019/fall-2019-applications-table-1-1.pdf
15. ACT, Inc., Current ACT Fees and Services, *available at* <https://www.act.org/content/act/en/products-and-services/the-act/registration/fees.html> (last accessed Sep. 4, 2019)
16. College Board, Fees, *available at* <https://collegereadiness.collegeboard.org/sat/register/fees> (last accessed Sep. 4, 2019)
17. Jack Meserve, *The SAT May Have Been Changed To Help The College Board Maximize Revenue*, THE MOTLEY FOOL (Mar. 7, 2014), *available at* <https://www.businessinsider.com/the-sat-may-have-been-changed-to-help-college-board-maximize-revenue-2014-3>
18. Transcript of Proceedings, *United States v. Tanner*, No. 17-cr-00061-LAP (S.D.N.Y. Oct. 30, 2018) (Dkt. 214)
19. Judgment, *United States v. Allen*, No. 18-cr-20773-KMW (S.D. Fla. July 8, 2019) (Dkt. 34)
20. Plea Agreement, *United States v. Allen*, No. 18-cr-20773-KMW (S.D. Fla. Oct. 3, 2018) (Dkt. 10)
21. Jury Verdict, *United States v. Esformes*, No. 16-cr-20549-RNS (S.D. Fla. April 5, 2019) (Dkt. 1245)
22. Unpublished Decisions
 - a. *United States v. Corrigan*, 273 F. App'x 15 (2d Cir. 2008)
 - b. *United States v. Rybicki*, 38 F. App'x 626 (2d Cir. 2002)
 - c. *United States v. Winters*, 62 F.3d 1418, 1995 WL 462415 (6th Cir. Aug. 3, 1995)
 - d. *United States v. Kelly*, No. 17-cr-547001-RWS, 2018 WL 2411593 (S.D.N.Y. May 29, 2018)